REMARKS/ARGUMENTS

In view of the following discussion, the Applicants submit that none of the claims now pending in the application are indefinite under the provisions of 35 USC § 112, second paragraph or obvious under the provisions of 35 USC § 103 (a). Thus, the Applicants believe that all of these claims are now in allowable form.

If, however, the Examiner believes that there are any unresolved issues requiring adverse final action in any of the claims now pending in the application, the Examiner should telephone Ms. Janet M. Skafar, Esq. at message telephone number (408) 463-5670 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Status of Claims

Claims 1-27 are pending in this application.

The Rejection of Claim 3 under 35 USC § 112

Claim 3 was rejected under 35 USC § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention because the claims recite the term "generating generates ...." and it is not clear to the Examiner as to what the "generating" is. In response, Applicants have amended Claim 3 as follows: "wherein said generating generates the second web page comprises comprising at least a subset of the second set of data having, at least in part, at least one of the second presentation format and the second behavior in accordance with the at least one setting". Applicants have also amended Claims 12 and 21 in a similar manner as Claim 3 to remove the term "generating generates".

The Rejection of Claims 1, 3-5, 10, 12-15, 19 and 21-23 under 35 USC § 103 (a)

Claims 1, 3-5, 10, 12-15, 19 and 21-23 were rejected under 35 USC § 103 (a) as being unpatentable over the Guedalia patent (U.S. Patent No. 6,121,970, granted on September 19, 2000) in view of Applicant Admitted Prior Art (AAPA). In response, Applicants have amended independent Claims 1, 10 and 19, and dependent claims 3, 12 and 21 to more particularly point out the invention.

Applicants respectfully submit that this combination does not disclose or suggest each and every element as claimed. More specifically, Applicants respectfully submit that the combination of the Guedalia patent in view of AAPA does not disclose or suggest "in response to a request from a first web application having a first web page having a first presentation format and a first behavior, the first web application being on a first server computer, the request specifying at least one setting, generating a second web page, by a second web application external to the first web application, the second web application being on a second server computer, the second web page having a second presentation format and a second behavior, the second web page being generated in accordance with the at least one setting, wherein the at least one setting controls, at least in part, at least one of the second presentation format and the second behavior" as claimed.

In column 4, lines 25-41, and column 12, lines 31-35, the Guedalia patent describes interaction of a user with a digital image. In the Guedalia patent, a user at a browser is interacting with a single web application on a server computer. The Guedalia patent operates by partitioning the view window, in which the client is displaying changing images as the user navigates. The window region is partitioned in a number of sub-regions. These sub-regions are typically not visible to the user. Whenever the user clicks on the image being displayed, the browser sends the mouse pointer coordinates back to the server. The server then calculates which sub-region these coordinates belong

to, and dynamically embeds a corresponding response image into the HTML page being returned to the client. (See the Guedalia patent, column 3, lines 66 to column 4, line 8). "The server's role is simply to identify which of these images is to be displayed in response to a specific interactive user command, and to prepare that image in a form that the browser recognizes, such as JPEG." (See the Guedalia patent, column 4, lines 14-17). Therefore, the Guedalia patent discloses a browser and a single server, that is, a single web application, that displays digital images and sub-regions of digital images. As shown in Fig. 2 of Applicants' patent application, the browser is different from a web application in Applicants' patent application.

Unlike in the claimed invention, the Guedalia patent does not disclose a first web application, the first web application being on a first server computer, and a second web application, the second web application being on a second server computer. The Guedalia patent does not disclose a second web application external to the first web application. The Guedalia patent does not disclose "a request from a first web application having a first web page having a first presentation format and a first behavior, the first web application being on a first server computer," and "generating a second web page, by a second web application external to the first web application, the second web application being on a second server computer, the second web page having a second presentation format and a second behavior, the second web page being generated in accordance with the at least one setting, wherein the at least one setting controls, at least in part, at least one of the second presentation format and the second behavior." For the foregoing reasons, Applicants respectfully submit that the neither the Guedalia patent nor the AAPA, explicitly or implicitly, alone or in combination, teach or suggest all the limitations of the claimed invention.

The rejection asserts that the Guedalia patent discloses the message the client sends to the server indicating which image the user is requesting also contains the client's state information (presentation format and behavior specifying at least one

setting), which includes the size and location of the view window (column 4, lines 58-59). In column 14, lines 31-44, the Guedalia patent states: "Internet browsers provide a mechanism, referred to as image maps, for carrying out this process. Image maps enable a browser to extract the coordinates of the location of the mouse pointer when the user clicks on the mouse, and send these coordinates back to the server. The server in turn receives these coordinates and calculates that sub-region within which they are situated. FIG. 2 illustrates a user clicking within sub-region 1. In order to calculate the sub-region within which the mouse coordinates are located, the server also needs to know the size and location of the view window; i.e. client state information. This client state information can also be sent from the client to the server, along with the mouse coordinates." Therefore, in the Guedalia patent, the client state information that flows from the client to the server is used to identify the sub-region within the digital image that a user selects. The receipt of this information allows the server to select the portion of the first image to be subsequently displayed. Therefore, the client state information of the Guedalia patent is analogous to search criteria which is used to select data to be displayed on a web page.

The client state information of the Guedalia patent is different from the at least one setting of the claimed invention. The claimed invention recites: "a request from a first web application having a first web page having a first presentation format and a first behavior, the first web application being on a first server computer, the request specifying at least one setting, generating a second web page, by a second web application external to the first web application, the second web application being on a second server computer, the second web application having a second presentation format and a second behavior, the second web page being generated in accordance with the at least one setting, wherein the at least one setting controls, at least in part, at least one of the second presentation format and the second behavior."

The rejection of Claim 3 asserts that the presentation format and behavior information could have been included in the client state information message; however, the asserted client state information message is from a client to a server, and not from a first web application on a first server computer to a second web application on a second server computer.

Furthermore the Guedalia patent produces a different result from the claimed invention. The Guedalia patent allows a user to interactively view digital images derived from a digital image. The Guedalia patent creates a new HTML page with a digital image that is an enlarged portion of the digital image contained within the prior HTML page. Using the claimed invention, both structured and unstructured data derived from digital data can be contained in the first and second web pages, and the unstructured data need not be a digital image. The claimed invention allows a user to view structured data or unstructured data that is derived from a different set of digital data than the digital data from which the digital image contained within the prior HTML page was derived.

For the foregoing reasons, Applicants respectfully submit that Claim 1 is not obvious by the Guedalia patent in view of AAPA. Claims 10 and 19 have similar distinguishing limitations as Claim 1, and are patentable for the same reasons as Claim 1. Claims 3-5, 12-15 and 21-23 depend from Claims 1, 10 and 19, and are patentable for the same reasons as Claims 1, 10 and 19, respectively.

The Rejection of Claims 2, 11 and 20 Under 35 USC 103(a)

Claims 2, 11 and 20 were rejected under 35 USC 103 (a) as being unpatentable over the Guedalia patent, in view of AAPA, further in view of Cragan et al (U.S. Patent No. 6,161,112, granted on Dec. 12, 2000). The Applicants respectfully disagree, and traverse the rejection.

Claims 2, 11 and 20 depend from independent claims 1, 10 and 19, respectively, and Applicants respectfully request that the Examiner withdraw the rejection, at least based on the reasons made for the related independent claims.

The Rejection of Claims 6-9, 15-18 and 24-27 under 35 USC 103(a)

Claims 6-9, 15-18 and 24-27 were rejected under 35 USC 103 (a) as being unpatentable over the Guedalia patent, in view of AAPA and further in view of the Percival patent application (U.S. Published Patent Application No. 2004/0039795 A1). The Applicants respectfully disagree and traverse the rejection.
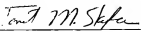
Claims 6-9, 15-18 and 24-27 depend, either directly or indirectly, from independent claims 1, 10 and 19, respectively; and Applicants respectfully request that the Examiner withdraw the rejection, at least based on the reasons made for the related independent claims.

Conclusion

Consequently, the Applicants believe that all these claims are presently in condition for allowance. Accordingly, both reconsideration of this application and its swift passage to issue are earnestly solicited.

Respectfully submitted,

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